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7 Attorney for Joseph Gabaldon

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,
11
12 Plaintiff,
13 v.
14 JOSEPH GABALDON,
15 Defendant.

Case No. 2:20-cr-00241-JCM-NJK

**STIPULATION TO CONTINUE
REVOCATION HEARING**
(First Request)

16
17 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,
18 United States Attorney, and Brian Y. Whang, Assistant United States Attorney, counsel for the
19 United States of America, and Rene L. Valladares, Federal Public Defender, and Jacquelyn N.
20 Witt, Assistant Federal Public Defender, counsel for Joseph Gabaldon, that the Revocation
21 Hearing currently scheduled on May 5, 2023, be vacated and continued to a date and time
22 convenient to the Court, but no sooner than sixty (60) days.

23 This Stipulation is entered into for the following reasons:

- 24 1. Defense counsel needs additional time to conduct mitigation investigation in
25 preparation for the revocation hearing.
26 2. Additional time is also needed to allow defense counsel to fully advise Mr.
Gabaldon on this matter.

1 3. Mr. Gabaldon is in custody and agrees with the need to continue the hearing.

2 4. The parties agree to the continuance.

3 This is the first request for a continuance of the revocation hearing.

4 DATED this 4th day of May, 2023.

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6 RENE L. VALLADARES
7 Federal Public Defender

 JASON M. FRIERSON
 United States Attorney

8 By /s/ Jacquelyn N. Witt

 By /s/ Brian Y. Whang

9 JACQUELYN N. WITT
10 Assistant Federal Public Defender

 BRIAN Y. WHANG
 Assistant United States Attorney

